

1 Sarah Ferguson (NSBN 14515)  
Parsons Behle & Latimer  
2 50 W. Liberty Street, Suite 750  
Reno, Nevada 89501  
3 Telephone: (775) 323-1601  
sferguson@parsonsbehle.com  
4

*Attorney for Defendants Jerritt Canyon Gold LLC  
and FM US Holdings Limited*

6 IN THE UNITED STATES DISTRICT COURT

7 FOR THE DISTRICT OF NEVADA

8 NICANDRO ROSALES, Individually and  
On Behalf of Others Similarly Situated,

9 Plaintiff,

10 vs.

11 JERRITT CANYON GOLD LLC and FM  
12 US HOLDINGS LIMITED,

13 Defendants.  
14

Case No. 2:25-cv-00269-GMN-MDC

**STIPULATION AND ~~Proposed~~ ORDER TO  
EXTEND DEADLINE FOR DEFENDANTS  
TO FILE RESPONSIVE PLEADING TO  
COMPLAINT**

**(First Request)**

15 Plaintiff Nicandro Rosales (“Plaintiff”) and Defendants Jerritt Canyon Gold LLC and FM  
16 US Holdings Limited (“Defendants” and, together with Plaintiff, the “Parties”), by and through  
17 their undersigned counsels of record, hereby agree and stipulate to extend the deadline for  
18 Defendants to file a responsive pleading to Plaintiff’s Complaint on file herein to and including  
19 April 22, 2025. During the stipulated extension, the Putative Class Members will not be prejudiced.  
20 The Parties agree that the statute of limitations under the Fair Labor Standards Act will be tolled  
21 for the Putative Class Members, as defined in the Complaint, from the date of the filing of this  
22 extension through April 22, 2025. Nothing herein constitutes an admission by Defendants regarding  
23 the defined class, if any, nor does the tolling apply to the statute of limitations for the underlying  
24 claims in the Complaint.

25 This is the first request by Defendants for an extension of this deadline. This Stipulation is  
26 made in good faith and not for the purposes of delay, but rather to allow the Parties to engage in

27 ///

28 ///

1 settlement negotiations to attempt to resolve all claims and conserve resources during said  
2 negotiations.

3 Dated: March 10, 2025.

Dated: March 10, 2025.

4 RODRIGUEZ LAW OFFICES, P.C.

PARSONS BEHLE & LATIMER

5 /s/ Esther C. Rodriguez

6 Esther C. Rodriguez (NSBN 006473)  
7 10161 Park Run Drive, Suite 150  
8 Las Vegas, NV 89145  
Telephone: (702) 320-8400  
[info@rodriguezlaw.com](mailto:info@rodriguezlaw.com)

-and-

9 Michael A. Josephson, TX Bar No. 24014780\*  
10 Andrew W. Dunlap, TX Bar No. 24078444\*  
Josephson Dunlap LLP  
11 11 Greenway Plaza, Suite 3050  
Houston, TX 77046  
Telephone: (713) 352-1100  
12 [mjosephson@mybackwages.com](mailto:mjosephson@mybackwages.com)  
[adunlap@mybackwages.com](mailto:adunlap@mybackwages.com)

-and-

13 Richard J. (Rex) Burch, TX Bar No. 24001807\*  
14 Bruckner Burch PLLC  
15 11 Greenway Plaza, Suite 3025  
Houston, TX 77046  
Telephone: (713) 877-8788  
16 [rburch@brucknerburch.com](mailto:rburch@brucknerburch.com)

17 *Attorneys for Plaintiff*

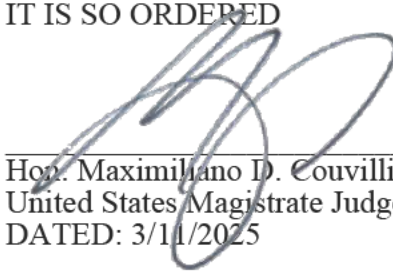
18 *\* Pro Hac Vice Applications Pending*

/s/ Sarah Ferguson

Sarah Ferguson (NSBN 14515)  
50 W. Liberty Street, Suite 750  
Reno, NV 89501  
Telephone: (775) 323-1601  
[sferguson@parsonsbehle.com](mailto:sferguson@parsonsbehle.com)

*Attorney for Defendants*

21 IT IS SO ORDERED

22   
23  
24 Hon. Maximiliano D. Couvillier III  
United States Magistrate Judge  
25 DATED: 3/11/2025